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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 GREGORY WALTER NORRIS, an individual;  
10 and JACQUELINE COLETTE NORRIS, an  
11 individual,

12 Plaintiffs,

13 vs.

14 PLANET HOME LENDING, LLC, a foreign  
15 limited-liability company; EQUIFAX  
16 INFORMATION SERVICES, LLC, a foreign  
17 limited-liability company; EXPERIAN  
18 INFORMATION SOLUTIONS, INC., a foreign  
19 corporation; and TRANS UNION LLC, a  
20 foreign limited-liability company,

21 Defendants.

**Case No.:** 2:22-cv-00662-JCM-VCF

**STIPULATION TO EXTEND  
DISCOVERY DEADLINES**

**(Fourth Request)**

22 Defendant Planet Home Lending, LLC (“PHL”), and Plaintiffs Gregory Walter Norris and  
23 Jacqueline Colette Norris, (“Plaintiffs” and collectively the “Parties”), by and through their  
24 undersigned counsel of record, hereby respectfully submit this Stipulation to Extend Discovery  
25 Deadlines (Fourth Request) pursuant to LR 26-4 and LR IA6-1. The current discovery deadline is  
26 January 8, 2024. The Parties request that this and corresponding deadlines be extended 60 days to  
27 accommodate pending written discovery requests and the notices of depositions of PHL’s 30(b)(6)  
28 representative and Plaintiffs. This is the Parties fourth request for an extension of the deadlines.

**DISCOVERY COMPLETED.**

1. On December 21, 2022, PHL served its Initial Disclosures.

2. On December 23, 2022, Plaintiffs served their Initial Disclosures.
3. On January 13, 2023, Plaintiff served a Notice of Planet Home Lending, LLC's Rule 30(b)(6) Deposition and their Written Request for Production on PHL.
4. On January 24, 2023, PHL served its First Supplemental Disclosures.
5. On February 7, 2023, Plaintiffs served a Notice of Cancellation of Deposition of the 30(b)(6) representative for Planet Home Lending, LLC.
6. On March 29, 2023, PHL served its Responses to Plaintiffs' Request for Production.
7. On October 4, 2023, PHL served its Written Discovery Requests (Requests for Admission, Interrogatories, and Requests for Production) on Plaintiffs.
8. On October 17, 2023, Plaintiff served a Notice of Planet Home Lending, LLC's Rule 30(b)(6) Deposition.
9. On October 19, 2023, PHL served a Notice of Plaintiffs' Depositions.
10. On November 16, 2023, PHL served an Amended Notice of Plaintiffs' Depositions.
11. On November 20, 2023, Plaintiffs served their First Supplemental Disclosures.
12. On November 27, 2023, Plaintiffs served their Responses to PHL's Written Discovery Requests (Requests for Admission, Interrogatories, and Requests for Production).
13. On December 7, 2023, PHL served a Second Amended Notice of Plaintiffs' Depositions.
14. On December 18, 2023, Plaintiffs served their Second Supplemental Disclosures.

**I. SPECIFIC DESCRIPTION OF DISCOVERY THAT REMAINS TO BE COMPLETED.**

1. PHL's Rule 30(b)(6) Deposition – pending new date.
2. Plaintiffs' Depositions – currently set for December 22, 2023.

**II. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN TIME LIMITS SET BY DISCOVERY PLAN.**

The parties have been in active settlement discussion regarding this case since its inception and were hopeful that a resolution would come by now. The parties are still discussing settlement and are hopeful that they can soon come to a resolution prior to the reset discovery deadline. The only

discovery remaining is the depositions of the parties. The parties may also request a settlement conference either prior to or after the close of discovery. Moreover, the parties entered into a Stipulated Protective Order on November 30, 2023, and documents subject to the protective order are in the process of being produced via discovery.

**III. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY AND RELATED DEADLINES.**

1. Expert Disclosures (initial) – deadline passed
2. Expert Disclosures (rebuttal) – deadline passed
3. Discovery cut off deadline –March 8, 2024
4. Dispositive motion deadline –April 8, 2024
5. Pre-Trial order deadline – May 7, 2024

The Parties submit this stipulation in good faith and not for purposes of delay or to prejudice to any party.

DATED this 19th day of December, 2023.

<p><b>WRIGHT, FINLAY &amp; ZAK, LLP</b></p> <p><u>/s/ Ramir M. Hernandez</u>  Christina V. Miller, Esq.  Nevada Bar No. 12448  Ramir M. Hernandez, Esq.  Nevada Bar No. 13146  7785 W. Sahara Ave., Suite 200  Las Vegas, Nevada 89117  Attorneys for Defendant, Planet Home Lending, LLC</p>	<p><b>J. COGBURN LAW</b></p> <p><u>/s/ Jamie Cogburn</u>  Jamie Cogburn, Esq.  Nevada Bar No. 8409  2580 St. Rose Pkwy., Suite 330  Henderson, Nevada 89074  Attorneys for Plaintiffs, Gregory Walter Norris and Jacqueline Colette Norris</p>
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**IT IS SO ORDERED.**

DATED: December 20, 2023

  
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CAM FERENBACH,  
US MAGISTRATE JUDGE